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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

MEMORANDUM:

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DATE: September 8, 1977

SUBJECT: PSD Applicability to Exxon Chemical Modification,  
Baytown, Texas

FROM: Director, Division of Stationary Source Enforcement

TO: Eloy R. Lozano, Director  
Air and Hazardous Materials Division

This is in response to your memo dated July 13, 1977, concerning the Exxon Chemical Company in Baytown, Texas. It involves a modification to Exxon Chemical Company's existing petrochemical plant, located at the site of the Exxon petroleum refinery. As the regulations are promulgated in Part 52, the petrochemical plant would be subject to the requirements of PSD, if it were considered as a part of the petroleum refinery.

Previous determinations regarding petrochemical plants at petroleum refineries have consistently interpreted the regulations as applying the PSD requirements to such petrochemical plants. The reason for this previous interpretation was that the petroleum refinery occupied a specific geographic area, and that anything occurring at that site would necessarily bring it within the requirements of the PSD regulations. In order to preserve this consistency, and to avoid any possible controversy which may develop since previous interpretations have required similar facilities to be subject to the PSD requirements, I believe that Exxon Chemical's modification should also be subject to the PSD requirements.

Passage of the Clean Air Act Amendments of 1977 explicitly requires sources of this nature to comply with PSD requirements upon revision of SIPs. I do not think it would be beneficial for the Agency to change its interpretation now, regarding these facilities, and then to go back and require these source types to meet the PSD requirement a short time thereafter.

If you have any additional questions or comments please contact Rich Biondi (755-2564) of my staff.

Edward E. Reich

cc: Dick Rhoads  
Mike Trutna